

From: Strauss, Bettina
Sent: Friday, February 19, 2016 1:52 PM
To: 'Richard A. Voytas'; Emanuel, James
Cc: Ashley Faust-Grigsby; Howard, Timothy; David Zevan; Burt Snell (burt.snell@butlersnow.com)
Subject: RE: IME of Sandra Wolfe
Importance: High

Rick,

As we just discussed on the phone, the fact is that Dr. Pramudji is available to do Mrs. Wolfe's IME today, with a maximum delay of an hour and a half and a minimum delay that could be less than an hour. She will see Mrs. Wolfe as soon as she gets out of surgery.

As we discussed, the travel arrangements that we paid for include a hotel room in St. Louis for Mrs. Wolfe this evening. There is a flight on United that leaves Houston at 5:59 and gets to St. Louis at 8pm that she can take that will get her to St. Louis this evening just slightly later than scheduled. Her plan to return home tomorrow will remain unchanged.

There is no prejudice to Mrs. Wolfe under these circumstances. Please have her reconsider. We do not wish to have to have her return, and as you know the Court has ruled we are entitled to an IME of Mrs. Wolfe.

Please let me know how to proceed.

Bettina



Bettina J. Strauss

Partner

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From: Richard A. Voytas [<mailto:rvoytas@zevandavidson.com>]
Sent: Friday, February 19, 2016 1:36 PM
To: Strauss, Bettina; Emanuel, James
Cc: Ashley Faust-Grigsby; Howard, Timothy; David Zevan; Burt Snell (burt.snell@butlersnow.com)
Subject: RE: IME of Sandra Wolfe

Bettina,

This is not a case where the doctor is running late. The office manager reports that neither she nor the doctor were ever informed that there was an IME today in the first place, nor were they even asked to hold the date. My client has met her obligation this afternoon. As I stated, she has agreed to stay until 2:00pm but will not wait any further. Your client has unlimited resources, but mine unfortunately does not- she wants to get home and she is angry and I am hard pressed to force her to remain in Houston.

Thank you,
Rick Voytas

From: Strauss, Bettina [<mailto:BJStrauss@BryanCave.com>]
Sent: Friday, February 19, 2016 1:32 PM
To: Richard A. Voytas <rvoytas@zevandavidson.com>; Emanuel, James <James.Emanuel@bryancave.com>
Cc: Ashley Faust-Grigsby <ashley@zevandavidson.com>; Howard, Timothy <timothy.howard@BryanCave.com>; David Zevan <David@zevandavidson.com>; Burt Snell (burt.snell@butlersnow.com) <burt.snell@butlersnow.com>
Subject: RE: IME of Sandra Wolfe

Rick,

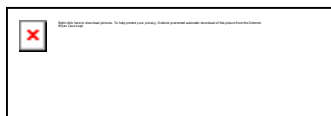
As I am sure you know, we cannot rush Dr. Pramudji through a surgery on another patient. The matter is simply not in anyone's control.

Please consider the situation here. A delay of an hour and a half necessitated by surgery does not strike me as reasonable grounds to refuse an IME ordered by the Court. We are very sorry for the inconvenience but things do happen with physician's schedules. Surely Mrs. Wolfe has had circumstances where her own doctors were delayed.

If Mrs. Wolfe refuses to stay, we will need to address the issue with the court and request she appear for her IME, pursuant to the Court's requirement. Please ask Mrs., Wolfe to reconsider. It will be much more inconvenient for her if she has to return to Houston and no one wants her to be inconvenienced.

Please call me if you want to discuss. Either way, please confirm your position.

Bettina



Bettina J. Strauss

Partner

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From: Richard A. Voytas [<mailto:rvoytas@zevandavidson.com>]
Sent: Friday, February 19, 2016 1:26 PM

To: Strauss, Bettina; Emanuel, James

Cc: Ashley Faust-Grigsby; Howard, Timothy; David Zevan; Burt Snell (burt.snell@butlersnow.com)

Subject: RE: IME of Sandra Wolfe

Bettina,

I just reached Ms. Wolfe. While she will not consent to change her outbound flight, she has agreed to wait an extra half-hour until 2:00pm for the exam to begin. Hopefully the doctor can see her by then. If not, my client is adamant about returning home.

Thank you,

Rick Voytas

From: Strauss, Bettina [<mailto:BJStrauss@BryanCave.com>]

Sent: Friday, February 19, 2016 12:59 PM

To: Richard A. Voytas <rvoytas@zevandavidson.com>; Emanuel, James <James.Emanuel@bryancave.com>

Cc: Ashley Faust-Grigsby <ashley@zevandavidson.com>; Howard, Timothy <timothy.howard@BryanCave.com>; David Zevan <David@zevandavidson.com>; Burt Snell (burt.snell@butlersnow.com) <burt.snell@butlersnow.com>

Subject: RE: IME of Sandra Wolfe

Importance: High

Rick,

Can you call me please before Ms. Wolfe leaves? This is the first we are hearing about any issues and I'd like to try to resolve this if possible.

Thanks

Bettina



Bettina J. Strauss

Partner

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From: Richard A. Voytas [<mailto:rvoytas@zevandavidson.com>]

Sent: Friday, February 19, 2016 12:50 PM

To: Emanuel, James

Cc: Ashley Faust-Grigsby; Strauss, Bettina; Howard, Timothy; David Zevan

Subject: RE: IME of Sandra Wolfe

Counsel,

It was our understanding that the IME was to occur today at 1:30; our client is at the facility in Houston now and the doctor claims there is no IME and that she has had two surgeries scheduled for today for quite some time- as such, there never could have been an IME on this date. As the doctor has stated she cannot perform the IME today, I am instructing Ms. Wolfe to return to the airport and fly home.

Thank you,

Rick Voytas

From: Emanuel, James [<mailto:James.Emanuel@bryancave.com>]
Sent: Friday, February 12, 2016 10:21 AM
To: Richard A. Voytas <rvoytas@zevandavidson.com>
Cc: Ashley Faust-Grigsby <ashley@zevandavidson.com>; Strauss, Bettina <BJStrauss@BryanCave.com>; Howard, Timothy <timothy.howard@BryanCave.com>
Subject: IME of Sandra Wolfe

Rick:

We have arranged for an IME of Sandra Wolfe with Dr. Christina Pramudji in Houston, TX on **February 19 at 1:30pm**. The IME will take place at the Methodist Medical Office Building One, 18400 Katy Freeway, Suite 530, Houston, TX 77094; you can find a map of the location [here](#). Dr. Pramudji's information can be found [on her website](#).

As we previously communicated, the IME will be conducted pursuant to the Court's ruling in the Lewis case. Additionally, *reasonable* travel expenses will be reimbursed (e.g. coach airfare/hotel). A quick google search shows several nice hotels in the area that are less than \$100.

Please confirm Ms. Wolfe will appear for her appointment, or, if there is any reason she cannot attend, please advise so we can file a motion with the Court.

Thank you,

James



James Emanuel, Jr.
Associate

T: +1 314 259 2263

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